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16 LIST OF COUNSEL CONTINUED ON SECOND PAGE

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19 GIUSEPPE PAMPENA, on behalf of  
20 himself and all others similarly situated,

21 Plaintiff,

22 vs.

23 ELON R. MUSK,

24 Defendant.

CASE NO. 3:22-CV-05937-CRB

**STIPULATION AND ~~[PROPOSED]~~  
ORDER**

Judge: Hon. Charles R. Breyer

Magistrate Judge: Hon. Donna M. Ryu

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18 *Attorneys for Defendant Elon Musk*

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**STIPULATION AND ~~[PROPOSED]~~ ORDER**

Pursuant to Civil Local Rule 7-12, the Parties, upon reaching agreement to the terms set forth below, jointly stipulate to resolve their discovery dispute surrounding depositions.

WHEREAS, the parties have met and conferred and, for good cause and based on the complexity and needs of the case, subject to the conditions below, agreed that each side should have leave to take twenty (20) non-expert depositions;

THEREFORE IT IS HEREBY STIPULATED AND AGREED, by the Parties hereto, through their undersigned counsel, subject to the approval of the Court, the parties stipulate to the following:

(1) The Parties are allowed to take up to twenty (20) non-expert depositions;

(2) The Parties agree to use best efforts to coordinate deposition scheduling so that the parties have two weeks' notice of the date the deposition is scheduled; and

(3) Defendant may have at least one hour on the record for any witness deposed by Plaintiffs, excluding the Defendant; if Defendant requests more than an hour of deposition time with a particular witness, the parties shall use best efforts to meet and confer in advance of any deposition to reach an agreement on the allotment of time so that Defendant can seek Court intervention if necessary. Nothing in this Stipulation shall be interpreted to limit the amount of time the Parties may have by right or under the applicable Federal Rules of Civil Procedure to depose on the record any witness subpoenaed or noticed for deposition or to preclude any Party from cross-noticing the deposition of any person subpoenaed for deposition by the other Party.

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1 IT IS HEREBY STIPULATED AND AGREED.

2  
3 DATED: February 11, 2025

4 /s/ Alex Bergjans

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*Attorneys for Plaintiff*

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

I, Tyson C. Redenbarger, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 11<sup>th</sup> day of February, 2025 at Burlingame, California.

By /s/ Tyson C. Redenbarger  
Tyson C. Redenbarger

~~**PROPOSED**~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: February 11, 2025

By: 

HONORABLE DONNA M. RYU  
CHIEF MAGISTRATE JUDGE